

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
(TRENTON VICINAGE)**

**LONGMEADOW ONE SOLAR LLC,
et al.**

Plaintiffs,

v.

TRINA SOLAR CO., LTD. et al.,

Defendants.

Civil Action No: 3:24-cv-03223-GC-JBD

**NOTICE OF MOTION TO DISMISS
THE SECOND AMENDED
COMPLAINT**

Oral Argument Requested

TO: THE CLERK OF THE COURT AND ALL COUNSEL OF RECORD

PLEASE TAKE NOTICE that as per the Court’s February 3, 2025 Order, on April 7, 2025 at 10:00 AM, or as soon thereafter as counsel may be heard, Defendant Trina Solar (U.S.), Inc. (“TUS”), by and through their undersigned counsel, will move before the Court, at the United States District Court, District of Jersey, Clarkson S. Fisher Building & U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608, for entry of an Order granting Defendant motion to dismiss pursuant to Federal Rule of Civil Procedure 12(b)(6) and to enter judgment thereupon.

PLEASE TAKE FURTHER NOTICE that in support of said Motion, Defendant will rely upon the Memorandum of Law of Trina Solar Co. Ltd., the Declaration of Ruofei Xiang, and all accompanying exhibits submitted herewith, together with all prior pleadings and proceedings. A proposed form of the Order has also been submitted in support of this motion.

PLEASE TAKE FURTHER NOTICE that Defendant Trina Solar (U.S.) Inc. requests oral argument in the event this application is opposed.

Dated: February 17, 2025

Respectfully submitted,

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